

IN THE UNITED STATES BANKRUPTCY COURT  
IN AND FOR THE EASTERN DISTRICT OF WASHINGTON AT SPOKANE

In Re:

NO. 18-03197-FPC

GIGA WATT, INC.,

Debtor.

DECLARATION OF SAMUEL J. DART IN  
SUPPORT OF APPLICATION FOR  
ADMINISTRATIVE EXPENSE AND FOR  
DECLARATORY RELIEF

**SAMUEL J. DART**, declares and states as follows:

1. I am over the age of 18 years, I have personal knowledge of the facts stated in this declaration, and I am otherwise competent to testify. I am one of the attorneys for the non-profit Creditors' Committee of WTT Token Holders and Miners ("**Owners**"), an interested party in the above-captioned matter.
2. I make this declaration in order to clarify the identity of the Owners and their standing to bring the motion for an administrative expense claim and associated request for declaratory relief.
3. The non-profit Creditors' Committee of WTT Token Holders and Miners was created to advance the joint interests of a group of individuals, the majority of whom have filed claims in this bankruptcy case. The non-profit allows the Owners to advance their shared interests and legal claims related to the Giga Watt bankruptcy. Individually, it would be prohibitively expensive for the Owners to advance their interests and, if they were to do so, would inundate the court with nearly identical legal pleadings. A true and correct copy of the

DECLARATION IN SUPPORT OF APPLICATION FOR  
ADMINISTRATIVE EXPENSE - 1



1201 Pacific Ave., Ste. 1200  
Tacoma, WA 98402  
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Fax 253.272.5732  
www.eisenhowerlaw.com

1 registration information for the non-profit entity on file with the Washington State Secretary  
2 of State is attached as **Exhibit A** and incorporated by reference.

- 3 4. Each Owner represented by the Motion for Administrative Expense has done so as part of  
4 a joint effort to advance the interests of a group of similarly situated individuals. Members  
5 of the non-profit each signed a membership agreement in order to join the non-profit and  
6 consented to representation as a group. A true and correct sample of the agreements signed  
7 by each member is included as **Exhibit B** to this declaration.
- 8 5. As set forth in the Motion for Administrative Expense, the Owners each assert that Debtor  
9 has enjoyed the benefit of their property, in the form of physical machines that mine digital  
10 currency and/or use of space already leased as represented by WTT Tokens. These Owners  
11 represent a significant portion of the filed claims in this case. A list matching Owners to  
12 claims filed in this case is included as **Exhibit C** to this declaration.
- 13 6. I declare under the penalty of perjury and in accordance with the laws of the United States  
14 that the foregoing is true and correct.

15  
16 DATED this 5th day of May, 2020 at Gig Harbor, Washington.

17  
18  
19 By: /s/ Samuel J. Dart  
20 Samuel J. Dart

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26  
DECLARATION IN SUPPORT OF APPLICATION FOR  
ADMINISTRATIVE EXPENSE - 2



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# **EXHIBIT A**

## **Dart Declaration**

*In re Giga Watt, Inc.*, 18-03197-FPC (E.D. Wash. Bankr.)

## BUSINESS INFORMATION

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Business Name:

**CREDITORS' COMMITTEE OF WTT TOKEN HOLDERS AND MINERS A NONPROFIT CORPORATION**

UBI Number:

**604 386 110**

Business Type:

**WA NONPROFIT CORPORATION**

Business Status:

**ACTIVE**

Principal Office Street Address:

**12128 N. DIVISION ST #426, SPOKANE, WA, 99218, UNITED STATES**

Principal Office Mailing Address:

Expiration Date:

**01/31/2021**

Jurisdiction:

**UNITED STATES, WASHINGTON**

Formation/ Registration Date:

**01/15/2019**

Period of Duration:

**PERPETUAL**

Inactive Date:

Nature of Business:

**BENEVOLENT**

## REGISTERED AGENT INFORMATION

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Registered Agent Name:

**LEGALINC CORPORATE SERVICES INC.**

Street Address:

**1001 4TH AVE STE 3200, SEATTLE, WA, 98154-1003, UNITED STATES**

Mailing Address:

## GOVERNORS

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Title	Governors Type	Entity Name	First Name	Last Name
GOVERNOR	INDIVIDUAL		JOHN	WINSLOW

# **EXHIBIT B**

## **Dart Declaration**

*In re Giga Watt, Inc.*, 18-03197-FPC (E.D. Wash. Bankr.)

**CREDITORS' COMMITTEE OF WTT TOKEN HOLDERS AND MINERS A NONPROFIT CORPORATION - MEMBERSHIP FORM**

The corporation represents WTT token holders and miners as creditors in the Gigawatt Inc. bankruptcy process. The specific objectives and purpose of this organization shall be:

- a. to provide a common voice and advocate for WTT token holders and miners
- b. to be an information clearing house for the bankruptcy process
- c. to provide resources for proving and defending creditor claims
- d. to advocate for the removal of existing Gigawatt Inc. management and the appointment of a Chapter 11 US Trustee or bankruptcy administrator
- e. to advocate for the removal of Gigawatt PTE. LTD, Cryptonomos and other unqualified creditors from the creditor list
- f. to negotiate settlements with other creditors and organizations to optimize the amount of claim recovery or revive impaired assets to be a going concern.
- g. to pursue all means of recovering assets including Directors & Officers insurance from Gigawatt Inc. executives and escrow insurance from Perkins Coie.
- h. to help actively identify, reverse or prevent fraudulent transfers
- i. to pursue individuals at Gigawatt Inc. management for fraud and personal liability.

-I hereby apply to be a member of the **CREDITORS' COMMITTEE OF WTT TOKEN HOLDERS AND MINERS A NONPROFIT CORPORATION.**

-I attest that I own 278500 WTT tokens, 177 deployed miners and 35 undeployed miners at the Gigawatt Inc. facilities.

-I support the organization's purpose and objectives as well as the bylaws

Would you like to commit to donating \$200 or more to the organization to help with operational & legal costs and gain voting rights as a donor member? ☒ Yes ☐ No

Signature John Winslow

Date 01/16/2019

Print Name John winslow

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TITLE	WTT & Gigawatt Miner Creditor Committee Membership Form
FILE NAME	Membership Form .pdf
DOCUMENT ID	bff231d9ce32646ec11c90c4280e20eaa4db46e2
STATUS	● Completed

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## Document History



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**01/16/2019**  
18:27:00 UTC

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IP: 104.143.92.30



**01/16/2019**  
18:27:00 UTC

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**CREDITORS' COMMITTEE OF WTT TOKEN HOLDERS AND MINERS A NONPROFIT CORPORATION - MEMBERSHIP FORM**

The corporation represents WTT token holders and miners as creditors in the Gigawatt Inc. bankruptcy process. The specific objectives and purpose of this organization shall be:


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- b. to be an information clearing house for the bankruptcy process
- c. to provide resources for proving and defending creditor claims
- d. to advocate for the removal of existing Gigawatt Inc. management and the appointment of a Chapter 11 US Trustee or bankruptcy administrator
- e. to advocate for the removal of Gigawatt PTE. LTD, Cryptonomos and other unqualified creditors from the creditor list
- f. to negotiate settlements with other creditors and organizations to optimize the amount of claim recovery or revive impaired assets to be a going concern.
- g. to pursue all means of recovering assets including Directors & Officers insurance from Gigawatt Inc. executives and escrow insurance from Perkins Coie.
- h. to help actively identify, reverse or prevent fraudulent transfers
- i. to pursue individuals at Gigawatt Inc. management for fraud and personal liability.

-I hereby apply to be a member of the **CREDITORS' COMMITTEE OF WTT TOKEN HOLDERS AND MINERS A NONPROFIT CORPORATION.**

-I attest that I own 138,560 WTT tokens, 11 deployed miners and 0 undeployed miners at the Gigawatt Inc. facilities.

-I support the organization's purpose and objectives as well as the bylaws

Would you like to commit to donating \$200 or more to the organization to help with operational & legal costs and gain voting rights as a donor member? ☒ Yes ☐ No

Signature 

Date 01/15/2019

Print Name Scott Glasscock



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TITLE	WTT & Gigawatt Miner Creditor Committee Membership Form
FILE NAME	Membership Form .pdf
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## Document History



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**CREDITORS' COMMITTEE OF WTT TOKEN HOLDERS AND MINERS A NONPROFIT CORPORATION - MEMBERSHIP FORM**

The corporation represents WTT token holders and miners as creditors in the Gigawatt Inc. bankruptcy process. The specific objectives and purpose of this organization shall be:

- a. to provide a common voice and advocate for WTT token holders and miners
- b. to be an information clearing house for the bankruptcy process
- c. to provide resources for proving and defending creditor claims
- d. to advocate for the removal of existing Gigawatt Inc. management and the appointment of a Chapter 11 US Trustee or bankruptcy administrator
- e. to advocate for the removal of Gigawatt PTE. LTD, Cryptonomos and other unqualified creditors from the creditor list
- f. to negotiate settlements with other creditors and organizations to optimize the amount of claim recovery or revive impaired assets to be a going concern.
- g. to pursue all means of recovering assets including Directors & Officers insurance from Gigawatt Inc. executives and escrow insurance from Perkins Coie.
- h. to help actively identify, reverse or prevent fraudulent transfers
- i. to pursue individuals at Gigawatt Inc. management for fraud and personal liability.

-I hereby apply to be a member of the **CREDITORS' COMMITTEE OF WTT TOKEN HOLDERS AND MINERS A NONPROFIT CORPORATION.**

-I attest that I own 2611 WTT tokens, 3 deployed miners and 22 undeployed miners at the Gigawatt Inc. facilities.

-I support the organization's purpose and objectives as well as the bylaws

Would you like to commit to donating \$200 or more to the organization to help with operational & legal costs and gain voting rights as a donor member? ☒ Yes ☐ No

Signature Scott Wilson

Date 01/15/2019

Print Name Scott Wilson

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TITLE	WTT & Gigawatt Miner Creditor Committee Membership Form
FILE NAME	Membership Form .pdf
DOCUMENT ID	344cb6ccad0e9f16c88a609bbf28aed9c968fea5
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# **EXHIBIT C**

## **Dart Declaration**

*In re Giga Watt, Inc.*, 18-03197-FPC (E.D. Wash. Bankr.)

<b><u>Claims Registry Name</u></b>	<b><u>Claim #</u></b>
Jun Dam	52
Alex Filippov	175
Alberto Jose Faria Camacho	326
Andrew Mark Campbell-Boross	154
Matteo Romani	102,117
Anton Shamanaev	204
Larry Eugene Baggs	147
Bryant Johnson	56
Jose Luis Blanco	215
Vladislav Manitskiy	168
Brandon Gordon	29
Likuo Lin	248
Ijupco nikolovski	225
CARLOS ENRIQUE FERNANDEZ CASTELLAN	101
Cesar Diaz, JRD Funding LLC	53
Charles F V DHAUSSY	315
Christian Schiffer	239
Clinton Douglas Luckinbill	79
CryptoDigger LLC	167
Igor Martirosian	131
Clinton F Sikes	275
Chen Du	165
Denis Veselovsky	230
Theatherstrasse 27c	258
David J Lutz	90
elieshay touboul	256
Douglas Berger	80
Michael Ilyankoff	122
Daniel James Ryser	213
Ibrahim Issa	124,157
hari krishna prasad menta venkata	311
Mikhail Meshkov	279
Eero Koskinen	82
Elder Yoshida	249
Emil Petrov Stanev	156
Joseph Errigo	49
Alex McVicker	197
Jung H. Cho	104
Chris Featherstone	302
fabio todeschini	75
Andrew Stock	235
Frank Daniel	229
Nathan Welling	109,244
Georgios Lignos	12-5
Anthony Martinez	94
Elisa U	194
Hiroaki Yamamoto	285
Grigory Klumov	73
Glen Allan Bradley	146
Grant Herholdt	280
Theocharis Aslanidis	95
Harlan Robinson	11-2

Joshua Hester	303
Hans-Peter Edenstrasser	107-2
Patrick Blount	127
Ivan Marcak	97
Jacqueline Bussey	61
Carmen J Hernandez G	232,114,234
Interflow LLC	39-3
Stefano Musumeci	76
Juan Bautista Ibarra Arana	84-3
Jeffrey Waldock	174
Jeffrey C Lutz	63
Alex Kutas	289
Jordi Grau	238
Jarno Hogeweg	59
Jaime Dario Mejia Martinez	310
Jonathan J Lutz	91
Joseph Brodsky	299
Joseph Smits	292
John Scevola	96
Jesse Samuel Wheeler	192
Krishna Karthik Reddy Adapala	119-2
Kenneth D McCoy	37-2
Ken Li Koh	242
Taverne Kevin	125
Mazaeva Maria	110
Lasse Kaihlavirta	38-3
Laurent HAMERS	139-2
Matthew Hine	188
Leon de Fleuriot de la Coliniere	277
Lester Ayllon	164
Roosevelt Scott	50
lior sharabi	316
Luke McIntyre	74-2
Joshua Mapperson	294
Mark Vange	293
mathias brachet	68
Matthew R Lutz	89
Michael Papenfuse	223
Luca Monterisi	57
Mikhail Filippov	140
Daryl Olsen	236
Phil A Dinwiddie	298
Mark R. Shapland	246
Neil Hutchings	186
Niva Johnson	314
nick nguyen	77
Marc Joyce	78
OMAR JAVIER MONSALVE SANCHEZ	178
Pablo V Hernandez G	257,116
Andrea Sharp	20-4
Primo Njega	202,203
Piervanni Ugolini Mugelli	276
RAVJI PATEL	190
Ronald Richard Johns, Jr.	17

Robert B Decker	243
Robert J. Hoyer	149
Roger L. Sutton	295
Rolf Jakobsen	173
John Hartleib	274
William Stephen Davis	247
Scott Glasscock	64
PHAM SONG TOAN	105
Spencer Ross	143
SCOTT ALAN WILSON	8-2
Talents 633 Ministries, NFP	9-2
Valerijs Sidoriks	151
Ioannis Violidakis	93
Aliaksei Volnov	209,210
Alan Walnoha	130
Gronski, Jeffrey G & Robin L	218
Wilhelmus Appel	278
Path of Four Winds, LLC	54
Howard Jones	148
Richard Wulliens	219
Yuet Choi Cheng	145
Wong Chun Ming	253-2
Yurii Kuzmin	113-2
Ruben del Muro	108
Alexander R S Garnock	106
Andrew J Blyler	42
Ben Assad	66-2
Brian Donn	176
Cesar Diaz	53
James Lutz	309
Antony Gisholt	25-3
Alex Kutas	289
Sergei Dzvonik	291
Carmen J Hernandez G	234,232,114
Filip Scheperjans	207,208
William M Patton	284
Koji Michiwaki	85-5
John Kowalski	193
Jeff Chin	51
John Winslow	60
John Guille	58
Eero Koskinen	82
Michael Wagner	170
Christian A. Eichert	329
Harikrishna P Menta Ven	311
Mark Weitzel	296
Robert Ilievski	92-3
R.Rietveld	118
Michael Detrinidad	150
Tuomas Karjalainen	26-2,123-3
Jared Morrissey	337
Xiaoming Lu	166
Hendrik Jan van Nuijssenborgh	352